

NCAP

Northwest Coalition for
Alternatives to Pesticides



"Inert" Ingredients in Pesticide Products Approved for Use in Organic Production Comments to the National Organic Standards Board

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Austin, Texas

Prepared by the Northwest Coalition for Alternatives to Pesticides

Comments presented by Toni Feder

Good morning, and thanks for the opportunity to provide comments to the NOSB. I am speaking today on behalf of the 2000 members of the Northwest Coalition for Alternatives to Pesticides. Many of NCAP's members are enthusiastic consumers of organically grown food. I would like to address the issue of the so-called inert ingredients in pesticide products that are used by organic growers.

I'll start by simply reminding everyone here about the definition of "inert" in pesticides. It does not mean chemically, biologically, or toxicologically inert. Instead, it is defined by our federal pesticide law and includes everything in a pesticide which manufacturers and regulatory agencies have not classified as active. Inerts are used in pesticide products to make them more potent or easier to use.

Many of the synthetic chemicals used as inert ingredients pose a variety of hazards to human and environmental health. The national organic standards recognized these hazards, and chose to allow only a relatively small list of inert ingredients to be used in products acceptable for use in organic production without undergoing review by the NOSB. This list is those classified by the U.S. Environmental Protection Agency (EPA) as "inerts of minimal concern."

NCAP and our members believe that is critically important for the NOSB to maintain the strength of the policies about inerts established in the national standards. The organic industry is successful because of the trust that exists between the industry and consumers. Consumers are willing to pay a premium price for organic food and cosmetics in order to provide healthy food for themselves and their families and to support sustainable agricultural practices. In order to maintain this trust, consumers must feel confident that synthetic materials incompatible with organic farming are not being used by organic growers.

Some pesticide products traditionally used by organic growers are not currently in compliance with the national standards. These products should be dealt with on a case-by-case basis, and when necessary, pesticide manufacturers given additional time to bring their products into compliance with the standards. The standards and the National List, however, need to remain strong in order to maintain the consumer trust on which the organic industry is based.

Comments presented by Karen Balthrop

Good morning. I am also speaking on behalf of the 2000 members of the Northwest Coalition for Alternatives to Pesticides. We really appreciate this opportunity to provide comments to the NOSB about the issue of inert ingredients in pesticides used

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by organic growers.

Many synthetic inert ingredients are chemicals that most consumers would be horrified to find being used in organic production. I'll just give one example.

Consider naphthalene. This chemical caused lung tumors in laboratory tests conducted by the National Toxicology Program. According to the National Library of Medicine, naphthalene exposure also causes headaches, lethargy, nausea, and anemia. Children seem to be particularly sensitive to naphthalene-caused anemia. And probably most important from the perspective of maintaining the integrity of the organic industry, naphthalene is actually also used as the "active" ingredient in 14 pesticide products, including moth balls and flakes.

NCAP thinks it is critically important to avoid, for example, giving national media the opportunity to indict the organic industry for using a chemical with hazards like naphthalene. Maintaining the strong policies about inert ingredients currently in the national standards is extremely important.

I'd also like to take just a few minutes to talk about what coming up for the issue of inert ingredients. Under a law passed in 1996, the Food Quality Protection Act, the U.S. Environmental Protection Agency is reviewing pesticide chemicals, including inert ingredients. According to this law, the review must be completed by August, 2006. EPA has indicated that as part of that review many more chemicals used as inert ingredients will be moved to the "inerts of minimal concern" list. This is the lists of inerts that the national standards currently identify as acceptable for use in organic production without NOSB review. It is likely that many chemicals that truly are incompatible with consumer's definition of "organic" will be moved to the minimal concern list. NCAP believes that this means that NOSB will need to carefully review the "inerts" issue in the next few years.